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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re Applications of ) MM Docket No. 99  
READING BROADCASTING, INC. ) File No. BRCT-940407KF  
For Renewal of License of )  
Station WTVE(TV), Channel 51 )  
Reading, Pennsylvania )  
and )  
ADAMS COMMUNICATIONS CORPORATION ) File No. BPCT-940630KG  
For Construction Permit for a New )  
Television Station to Operate on )  
Channel 51, Reading, Pennsylvania )  
To: Chief, Mass Media Bureau

ADAMS COMMUNICATIONS CORPORATION'S INTERROGATORIES  
TO THE MASS MEDIA BUREAU

Adams Communications Corporation ("Adams"), pursuant to Sections 1.311 and 1.323 of the Commission's Rules, submits the following interrogatories to the Mass Media Bureau ("Bureau"). These interrogatories are to be deemed continuing in character. Thus, the Bureau has an obligation to provide to Adams any additional responsive information that may come to the Bureau's attention subsequent to its answering these interrogatories.

Definitions

The following definitions shall control in these Interrogatories:

The term "identify" when used with reference to a person means to state his or her full name, employment position at the time relevant to the Answer hereto, and current employment position.

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The term "identify" when used with reference to communications means to state: the date of the communication; the persons participating in the communication; whether the communication was oral or written; if oral, whether the communication was in person or by telephone; a summary of the substance of the communication.

The term "processing" when used in reference to applications filed with the Commission means the substantive review and evaluation of any such application performed by staffmembers of the Bureau leading to the grant of such application.

The term "Mt. Baker Decision" means the Memorandum Opinion and Order of the Commission in Mt. Baker Broadcasting Co., Inc., 3 FCC Rcd 4777 (1988).

The term "Religious Broadcasting Decision" means the Decision of the Review Board in Religious Broadcasting Network, 3 FCC Rcd 4085 (Rev. Bd. 1988), which affirmed the Initial Decision reported at 2 FCC Rcd 6561 (ALJ 1987).

#### Interrogatories

1. Identify all persons who participated in the Bureau's processing of the following applications:

- (a) Application (File No. BTCCT-910725KG) for consent to the transfer of control of the licensee of Station WHRC(TV), Norwell, Massachusetts ("the Norwell Application");
- (b) Application (File No. BTCCT-911113KH) for consent to the transfer of control of the licensee of Station WTVE(TV), Reading, Pennsylvania ("the Reading Application");
- (c) Application (File No. BTCCT-920603KG) for consent to the transfer of control of the permittee of

Station KVMD(TV), Twentynine Palms, California ("the Twentynine Palms Application"); and

- (d) Application (File No. BALIB-9208100M) for consent to the assignment of license of International Broadcast Station KCBI, Dallas, Texas ("the Dallas Application").

2. With respect to each of the persons identified in response to Interrogatory 1(a), above, concerning the Norwell Application:

- (a) Identify all such persons who, in the course of the processing of the Norwell Application, read the portion of Exhibit I to the Transferee's Portion of the Norwell Application containing references to the Mt. Baker and Religious Broadcasting Decisions.
- (b) With respect to each person identified in response to Interrogatory 2(a), state whether, in the course of the processing of the Norwell Application, such person read the Mt. Baker Decision (which was cited in the Norwell Application as "Memorandum Opinion and Order, FCC 88-234, released August 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (c) With respect to each person identified in response to Interrogatory 2(a), state whether, in the course of the processing of the Norwell Application, such person read the Religious Broadcasting Decision (which was cited in the Norwell Application as "Religious Broadcasting Network et. al., FCC 88R-38 released July 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did

not read that decision.

- (d) With respect to each person identified in response to Interrogatory 2(a), state whether, in the course of the processing of the Norwell Application, such person sought from the applicant, either orally or in writing, any additional information relevant to the application.
  - (i) For each person answering this Interrogatory in the affirmative, state why the additional information was sought, describe the nature of the additional information sought, describe the communication through which that additional information was sought, and describe any information provided by the applicant in response to such communication.
  - (ii) For each person answering this Interrogatory in the negative, state why no additional information was sought.

3. With respect to each of the persons identified in response to Interrogatory 1(a), above, concerning the Reading Application:

- (a) Identify all such persons who, in the course of the processing of the Reading Application, read the portion of Exhibit 3 to the Transferee's Portion of the Reading Application containing references to the Mt. Baker and Religious Broadcasting Decisions.
- (b) With respect to each person identified in response to Interrogatory 3(a), state whether, in the course of the processing of the Reading Application, such person read the Mt. Baker Decision (which was cited in the Reading Application as "Memorandum Opinion and Order, FCC 88-234, released August 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.

- (c) With respect to each person identified in response to Interrogatory 3(a), state whether, in the course of the processing of the Reading Application, such person read the Religious Broadcasting Decision (which was cited in the Reading Application as "Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (d) With respect to each person identified in response to Interrogatory 3(a), state whether, in the course of the processing of the Reading Application, such person sought from the applicant, either orally or in writing, any additional information relevant to the application.
  - (i) For each person answering this Interrogatory in the affirmative, state why the additional information was sought, describe the nature of the additional information sought, describe the communication through which that additional information was sought, and describe any information provided by the applicant in response to such communication.
  - (ii) For each person answering this Interrogatory in the negative, state why no additional information was sought.

4. With respect to each of the persons identified in response to Interrogatory 1(a), above, concerning the Twentynine Palms Application:

- (a) Identify all such persons who, in the course of the processing of the Twentynine Palms Application, read the portion of Exhibit 4 to the Twentynine Palms Application containing references to the Mt. Baker and Religious Broadcasting Decisions.
- (b) With respect to each person identified in response

to Interrogatory 4(a), state whether, in the course of the processing of the Twentynine Palms Application, such person read the Mt. Baker Decision (which was cited in the Twentynine Palms Application as "Memorandum Opinion and Order, FCC 88-234, released August 5, 1988").

- (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (c) With respect to each person identified in response to Interrogatory 4(a), state whether, in the course of the processing of the Twentynine Palms Application, such person read the Religious Broadcasting Decision (which was cited in the Twentynine Palms Application as "Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988").
- (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (d) With respect to each person identified in response to Interrogatory 4(a), state whether, in the course of the processing of the Twentynine Palms Application, such person sought from the applicant, either orally or in writing, any additional information relevant to the application.
- (i) For each person answering this Interrogatory in the affirmative, state why the additional information was sought, describe the nature of the additional information sought, describe the communication through which that additional information was sought, and describe any information provided by the applicant in response to such communication.
  - (ii) For each person answering this Interrogatory in the negative, state why no additional information was sought.

5. With respect to each of the persons identified in response to Interrogatory 1(a), above, concerning the Dallas Application:

- (a) Identify all such persons who, in the course of the processing of the Dallas Application, read the portion of Exhibit 3 to Assignee's Portion of the Dallas Application containing references to the Mt. Baker and Religious Broadcasting Decisions.
- (b) With respect to each person identified in response to Interrogatory 5(a), state whether, in the course of the processing of the Dallas Application, such person read the Mt. Baker Decision (which was cited in the Dallas Application as "Memorandum Opinion and Order, FCC 88-234, released August 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (c) With respect to each person identified in response to Interrogatory 5(a), state whether, in the course of the processing of the Dallas Application, such person read the Religious Broadcasting Decision (which was cited in the Dallas Application as "Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988").
  - (i) For each person answering this Interrogatory in the affirmative, state why that person read that decision.
  - (ii) For each person answering this Interrogatory in the negative, state why that person did not read that decision.
- (d) With respect to each person identified in response to Interrogatory 5(a), state whether, in the course of the processing of the Dallas Application, such person sought from the applicant, either orally or in writing, any additional information relevant to the application.

- (i) For each person answering this Interrogatory in the affirmative, state why the additional information was sought, describe the nature of the additional information sought, describe the communication through which that additional information was sought, and describe any information provided by the applicant in response to such communication.
- (ii) For each person answering this Interrogatory in the negative, state why no additional information was sought.

6. State whether, during the period 1991-1993, in processing applications for assignments of broadcast licenses or transfers of control of broadcast licensees, the Bureau distinguished between "routine" and "non-routine" processing of applications. If so,

- (a) describe the factors on which the Bureau distinguished between "routine" and "non-routine" applications; and
- (b) describe the respects (if any) in which the processing of applications on a "non-routine" basis differed from the processing of applications on a "routine" basis; and
- (c) state whether the disclosure, in an application, of previous findings of fraudulent or deceitful conduct by the applicant before the Commission would cause the application to be processed as a "non-routine" application; and
- (d) state, with respect to each of the applications listed in Interrogatory 1, above, whether each such application was processed as a "routine" or a "non-routine" application.

7. State, with respect to each of the applications listed in Interrogatory 1, above, whether the descriptions of the Mt. Baker and Religious Broadcasting Decisions as set forth in those applications provided notice to the Bureau's processing staff that those Decisions included determinations that a party



to the application had been found to have engaged in fraud or  
deceit upon the Commission.

Respectfully submitted,



/s/ Harry F. Cole  
Harry F. Cole

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Counsel for Adams Communications  
Corporation

March 2, 2000

CERTIFICATE OF SERVICE


I hereby certify that, on this 2nd day of March, 2000, I caused copies of the foregoing "Adams Communications Corporation's Interrogatories to the Mass Media Bureau" to be hand delivered (as indicated below), addressed to the following:

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/s/ Harry F. Cole  
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